

EXHIBIT 1

Bryson, Santana and Joshua v. Rough Country, LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

SANTANA BRYSON and JOSHUA)
BRYSON, as adminsitators of)
the Estate of C.Z.B. and as)
surviving parents of C.Z.B., a)
deceased minor.,)
PLAINTIFF,)
VS.) CASE NO.: 2:22=CV=017-RWS
ROUGH COUNTRY LLC,)
DEFENDANT.)
_____)

REPORTER'S TRANSCRIPT OF PROCEEDINGS
FRIDAY, MAY 5, 2024

APPEARANCES:

FOR THE PLAINTIFF:

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(Appearances continued next page.)

REPORTED BY: JUSTUS BALENTINE, CSR 13859

1 Q. No matter where you put the cargo, both seat
2 backs would be more deformed forward; correct?

3 A. No. As we talked about before, it's possible
4 that you could jam everything maybe all the way to the
5 right side of the vehicle, and then not get any
6 deformation of that left seat back, but that's not what
7 happened in either case, so there's no point in talking
8 about that.

9 But if the cargo had been exactly the same as it
10 was in the actual crash, which we will never know what
11 that was, then we would have even more forward
12 deformation of the Row 2 seat back, even without a lift
13 kit on the F250.

14 Q. And can you tell the Court how many more inches
15 of forward deformation there would have been?

16 A. No. I cannot for the reasons that we've already
17 discussed.

18 Q. Looking at Plaintiff's Exhibit 32, what in this
19 picture causes the impact to Cohen that would kill him?

20 A. What caused the impact to Master Bryson is the
21 deformed child safety seat with the Row 2 seat behind it,
22 which is being deformed in interacting with the child
23 seat and all the cargo behind it and the cargo -- the
24 lift gate behind it and the Ford F250 behind it.

25 Q. Can you circle -- well, back up.